

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

ROBIN CARTER	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Cause No.:
	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

**COMPLAINT**

COMES NOW, Plaintiff Robin Carter, by and through her attorney, Jarrod P. Beasley, of Kuehn, Beasley & Young, P.C. and for her Complaint against the United States of America, states as follows:

**(Count I – Federal Tort Claims Act)**

1. Plaintiff is and was at all relevant times a resident of St. Clair County, Illinois.
2. On or about May 9, 2018, Plaintiff was involved in a motor vehicle accident with Deputy U.S. Marshal William Weier.
3. Plaintiff's vehicle was hit while Marshal Weier was in the scope of his employment.
4. At all relevant times, defendant had a duty to exercise reasonable care in the maintenance and operation of his vehicle.

5. That at the above-mentioned time and place, defendant was negligent in one or more of the following ways:
  - a. Failed to reduce speed in order to avoid an accident;
  - b. Failed to keep a proper lookout in order to avoid an accident; and
  - c. Failed to exercise reasonable care in operating his motor vehicle.
6. That as a direct and proximate result of one or more of these negligent acts, Plaintiff was injured.
7. That Plaintiff has suffered, and will suffer in the future, severe injury and pain, lost enjoyment of life, pain and suffering and disability as a result of Defendant's negligence.
8. Plaintiff submitted her claim to the Defendant per the Statute via Form 95.
9. That more than six (6) months have elapsed since the submission of said claim.

WHEREFORE, Plaintiff prays for judgment against the Defendant, United States of America, in an amount greater than FIFTY THOUSAND DOLLARS (\$50,000.00), plus costs.

Respectfully Submitted,

/s Jarrod P. Beasley

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